

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

NEXSTAR MEDIA, INC. d/b/a KFOR-TV, et al.,

Plaintiffs,

v.

RYAN WALTERS, et al.,

Defendants.

Case No. 24-CV-00980-J

PLAINTIFFS' MOTION FOR TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION

To all parties and their counsel of record:

Please take notice that, as soon as the matter may be heard, Plaintiffs will and hereby move the Court under Rule 65 of the Federal Rules of Civil Procedure and Local Rule 65, for a temporary restraining order and for a preliminary injunction prohibiting Defendants and their officers, agents, divisions, commissions, and all persons acting under or in concert with them, from (1) denying Plaintiffs access to the room in which Oklahoma State Board of Education meetings are held; (2) denying Plaintiffs access to and participation in Walters' press conferences; and (3) physically obstructing, touching, or impeding Plaintiffs' reporters when they do access the in-person Oklahoma State Board of Education meetings or Walters' press conferences.

Expeditious resolution of this TRO application is requested prior to the OSDE board meeting on the morning of September 26th.

The grounds for this motion are set forth in the accompanying Brief, and declarations and exhibits in support which are being filed together with this motion and are expressly incorporated by reference herein.

Copies of all filings are immediately being tendered to the Oklahoma Attorney General.

Respectfully submitted,

Dated: September 23, 2024

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